UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

BRENTEN GEORGE and DENISE VALENTE-McGEE, individually and on behalf of similarly situated individuals,

Plaintiffs

v.

Case No. 16-CV-1678

CNH HEALTH & WELFARE PLAN, CNH EMPLOYEE GROUP INSURANCE PLAN, CASE NEW HOLLAND, INC., and BLUE CROSS BLUE SHIELD OF WISCONSIN,

Defendants.

PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT

Plaintiffs Brenten George and Denise Valente-McGee ("Plaintiffs") hereby move the Court for preliminary approval of the class action settlement reached with the Defendants in this case, pursuant to Federal Rule of Civil Procedure 23(e). The terms of the settlement are contained in the Settlement Agreement attached as Exhibit 1 to the accompanying Memorandum. Defendants have reviewed this Motion and the accompanying Memorandum and do not oppose this request. The reasons for this motion are set forth in the Memorandum in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Settlement, filed contemporaneously herewith.

As this Motion is unopposed, Plaintiffs respectfully request that the Court expeditiously enter the parties' agreed proposed order, attached as Exhibit 2 to the accompanying

Memorandum, so that the agreed notice may be provided to class members and this case may be scheduled for a final settlement hearing.

Dated this 1st day of September, 2017.

TUFFNELL LAW S.C.

Attorneys for Plaintiffs Brenten George and Denise Valente-McGee

/s/John B. Tuffnell

John B. Tuffnell Wis Bar No. 1047261 788 N. Jefferson St., Suite 900 Milwaukee, WI 53202 jbt@tuff-law.com (414) 550-2296

O'NEIL CANNON HOLLMAN DEJONG & LAING S.C.

Attorneys for Plaintiffs Brenten George and Denise Valente-McGee

/s/Christa D. Wittenberg

Douglas P. Dehler
Wis. Bar No. 1000732
Christa D. Wittenberg
Wis. Bar No. 1096703
111 East Wisconsin Avenue, Suite 1400
Milwaukee, WI 53202
douglas.dehler@wilaw.com
christa.wittenberg@wilaw.com
(414) 276-5000